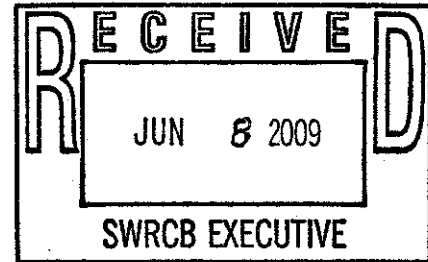


ORANGE COUNTY SANITATION DISTRICT



June 9, 2009

California State Water Resources Control Board
Attention: Ms. Jeanine Townsend, Clerk of the Board
1001 I Street
Sacramento, California 95814



Re: **Comment Letter – ARRA Subsidy**

To the Honorable Chair and Members of the Water Resources Control Board:

On behalf of the Orange County Sanitation District, I wish to express my continued disappointment with the State Water Resources Control Board (SWRCB) for excluding urban wastewater treatment agencies from subsidized ARRA funds.

Since March, my agency, along with others around the State, has commented that the distribution of Federal Stimulus (ARRA) funds coming to California should be equitable. We have repeatedly requested that that SWRCB set aside funds on a competitive basis to all wastewater treatment agencies; moreover, we have asked that these funds be *in addition to those already set aside for disadvantaged communities*. To date, all of our requests have been ignored.

With respect to the latest notice of opportunity to comment in advance of the June 16 meeting, I request that the additional 15 percent of ARRA Funds be made available as subsidized assistance (grants) to all wastewater treatment agencies on a competitive basis.

I make this request because it is my understanding that the definition of "disadvantaged community" used by the SWRCB *does not include* urban agencies (like OCSD) that serve disadvantaged populations but whose total service area exceeds 80 percent of the statewide median household income. Moreover, with crumbling urban infrastructure, joblessness and the need for job creation, urban agencies have a need for grant funds because during these tough economic times, raising rates is not an option and access to credit is tight.

Again, my request is simple: please make more subsidized assistance available to all agencies.

The SWRCB once again has the opportunity to provide additional subsidized assistance to all agencies in California and I urge you take advantage of this opportunity to allow all agencies in California to compete for small portion of the ARRA funds.

Sincerely,

Doug Davert
Chairman, Board of Directors